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M&T Bank

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

MICHAEL PATRICK SIANO TM

Plaintiff,

v.

M&T BANK, PARKER McCAY P.A. LAW OFFICES et al. and all Unknown Parties

Defendants.

Document Filed Electronically

Civil Action No.: 3:20-cv-12827-MAS-DEA

DEFENDANT M&T BANK'S APPLICATION FOR AN EXTENSION OF TIME TO ANSWER, MOVE OR OTHERWISE REPLY PURSUANT TO LOCAL RULE 6.1(b)

Application is hereby made for a Clerk's Order extending the time within which defendant M&T BANK may answer, move or otherwise reply to the Complaint with Quiet Title filed by the plaintiff herein and it is represented that:

- 1. No previous extension has been obtained.
- 2. Service of process may have been effectuated, if at all, on or about September 29, 2020.
- 3. Defendant M&T Bank's time to Answer, Move or otherwise Reply to the Plaintiffs' Amended Complaint, assuming service of process was properly effectuated, expires on October 20, 2020.

[signature page to follow]

| Dated: October 20, 2020 | Respectfully Submitted, /s/ James P. Berg James P. Berg, Esq. PARKER IBRAHIM & BERG LLP 270 Davidson Avenue, 5 th Floor Somerset, New Jersey 08873 Telephone: (908) 725-9700 Fax: (908) 333-6230 james.berg@piblaw.com Attorneys for Defendant, M&T Bank |
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| | ANTED, and the time within which defendant |
| M&T Bank may answer, move or otherwise reply | |
| fourteen (14) days to November 3, 2020. | to the Complaint med by plantin is extended |
| ORDER DATED: | |

By: ______ Deputy Clerk